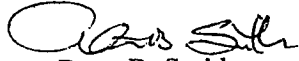


In conclusion, it is prudent to provide additional review opportunity for a project everyone will be living with for a very long time. Thank you for the opportunity to comment on these important matters.] RSF-4

Sincerely,



Peter B. Smith
Manager

Cc: Supervisor Bill Horn (Phil Rath)
Paul Marks, SDPG
Ms. Lindy Delaney, RSF School District
Ms. Karen Mossberg, Lennar
Steve Danon, Benedetto & Danon

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Stocks

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Robert J. Green
 Building Commissioner

June 15, 2006

#1,
 PC 6/30/06

San Diego County Planning Commission
 c/o Mr. Bill Stocks, DPLU
 5201 Ruffin Rd., Suite B
 San Diego, CA 92123

E

Re: The Bridges Unit 6/SPA 01-004, TM 5270 RPL, P85-084W, P85-064W, The Bridges Unit 7/TM 5239RPL, AD 01-001, So1-077; and Santa Fe Creek/SPA 03-006

Dear Planning Commissioners:

The additional proposed 29 residential lots in Unit 7 will result in significant traffic generation and attendant impacts on Aliso Canyon Road, El Camino del Norte and other connecting Covenant Roadways. County staff's proposed "specific conditions" contained in the draft Resolution appropriately call for "security" for the construction of roundabouts at the intersections of Paseo Delicias and El Camino del Norte, El Montevideo and Via de la Valle. What is missing is a requirement for "security" for a future roundabout at the intersection of Aliso Canyon Road and El Camino del Norte. This intersection will be subject to the most direct impacts including the future development of a school in the immediate vicinity.

RSF-5

To further mitigate traffic and circulation impacts, approvals should also be conditioned upon requirements to provide emergency services unrestricted access as well as controlled gated access to Bridges residents to and from Buman Road. This westerly access provides for shorter, more direct access for both emergency service providers and to residences assigned to the Encinitas School District and La Costa Canyon High School. Currently, school access is limited to a circuitous route via Aliso Canyon Road, El Camino del Norte and connecting roadways. This existing solitary and indirect access route results in many more vehicles miles traveled resulting in heightened congestion, pollution and noise on neighboring roadways; all mitigable conditions.

RSF-6

The issue of emergency access needs to be clarified. Pursuant to County staff's proposed condition, emergency access will be provided from Calle Ponte Bella to Buman Road. This and any other emergency access need to be unrestricted and open to all under emergency conditions. Where an emergency arises and regardless of who is affected, it is hard to believe that it would be anyone's intention to attempt to limit emergency access to those in need. In the event of an emergency, the Buman Road and any other Bridges

RSF-7

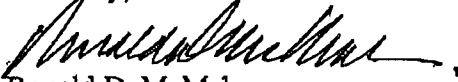
emergency access, whether to the northeast toward Elfin Forest, to the northwest by way of Fortuna Ranch Road or north to San Elijo Hills via Canyon del Oro, needs to be open to all, including schools or other current or future public and private facilities. This unequivocal statement needs to be contained within the adopted conditions.

RSF-7
Cont.

In conclusion, because of the un-mitigated impacts caused by the access and traffic generation deficiencies created by the proposed 29 lot subdivision, the findings cannot be made that the improvements are; (1) consistent with the General and San Dieguito Community Plan, (2) that the site is physically suitable for the proposed density because all necessary public services are available to the site, (3) that regional housing opportunities outweigh the impacts upon the public service needs of County residents and fiscal and environmental resources, and (4) that the proposed conditions adequately mitigate the associated impacts. Absent the adoption of mitigating conditions, as enumerated above, the Association opposes the proposed 29 unit development. Thank you for the opportunity to comment on these important matters.

RSF-8

Sincerely,



Ronald D. McMahon
President

Cc: Supervisor Bill Horn (Phil Rath)
Paul Marks, SDPG
Ms. Lindy Delaney, RSF School District
Mr. Ken Ayres, The Bridges
Steve Danon, Benedetto & Danon

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Ken Markstein
Jack Queen

Robert J. Green
Building Commissioner

June 26, 2006

San Diego County Planning Commission
c/o Mr. Bill Stocks, DPLU
5201 Ruffin Rd., Suite B
San Diego, CA 92123

Re: The Bridges Unit 6/SPA 01-004, TM 5270 RPL, P85-084W, P85-064W, The
Bridges Unit 7/TM 5239RPL, AD 01-001, Sol-077; and Santa Fe Creek/SPA 03-006

Dear Planning Commissioners:

County staff's proposed "specific conditions" contained in the draft Resolution appropriately call for "security" for the construction of roundabouts at the intersections of Paseo Delicias and El Camino del Norte, El Montevideo and Via de la Valle. What is missing is a requirement for "security" for a future roundabout at the intersection of Aliso Canyon Road and El Camino del Norte. This intersection will be subject to the most direct impacts including the possible future development of a school in the immediate vicinity. A condition for a "fair share" contribution toward the development of a future roundabout at the Aliso Canyon/El Camino del Norte intersection will address significant traffic generation and circulation issues and concerns.

RSF-9


Similarly, the County's draft resolution also calls for emergency accesses which are a necessary and prudent requirement for the approval of the project. Emergency access is an important necessity to provide adequate emergency access for both existing and future populations within the immediate vicinity. Currently, the area is accessed by a single entry road.

RSF-10

In conclusion, with the addition of a condition requiring a fair share "security" for the development of a roundabout at the Aliso Canyon/El Camino del Norte intersection, the Association supports staff's resolution for approval. Thank you for the opportunity to comment on these issues.

RSF-11

Sincerely,


Ronald D. McMahon
President

06/27/2006 13:45 8586943373
06/26/2006 09:34 8587569814

COUNTY SD DPLU
RSF ASSOC

PAGE 04
PAGE 03

Cc: Supervisor Bill Horn (Phil Rath)
Paul Marks, SDPG
Ms. Lindy Delaney, RSF School District
Mr. Ken Ayres, The Bridges
Steve Danon, Benedetto & Danon

RANCHO SANTA FE ASSOCIATION

RSF-1	The continuances requested by the comment were granted. -
RSF-2	To the extent that this comment refers to concerns about traffic which would have been generated by the Unit 7 Project, the comment no longer applies since Unit 7 has been withdrawn. See Introduction. Refer to Section 4.6.2 of the final EIR for the Alternative C traffic impacts and mitigation. The Project Applicant will be conditioned to contribute to the County's Transportation Impact Fees (TIF) in accordance with the County's TIF Ordinance. Refer to Mitigation Measure MM 4.6-6.
RSF-3	The County of San Diego acknowledges and appreciates this comment about the merit of traffic roundabouts. However, the comment fails to raise a specific environmental issue or make a substantive comment regarding the adequacy of the draft or final EIR or analyses therein.
RSF-4	Refer to Response to Comment RSF-1.
RSF-5	Refer to Response to Comment RSF-2.
RSF-6	The Alternative C Project does not include secondary circulation to the north or west (with the exception of Bumann Road emergency access which is for emergency use only) and the traffic impact analysis concludes that all traffic impacts can be mitigated to below a level of significance. An additional circulation route to the west or north was not warranted for traffic purposes. Refer to Section 4.6.2 of the final EIR for the Alternative C traffic impacts and mitigation.
RSF-7	The emergency access connection via Bumann Road was evaluated in the draft EIR. It is evaluated again in the final EIR, Chapter 4.6. See final EIR Responses to Comments F-5, I-13 and P-3,
RSF-8	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. The comment does not apply to Alternative C.
RSF-9	Refer to Response to Comment RSF-2.
RSF-10	The emergency access for Alternative C is via Bumann Road, which has been evaluated in the final EIR, Chapter 4.6. See Response to Comment RSF-7.
RSF-11	Refer to Response to Comment RSF-5, above.

Paul Daniel Marks
Attorney at Law

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May 26, 2006

Maggie Loy
Regulatory Planning
Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA 92123-1666

Re: Response to Final EIR for The Bridges' Units 6 and 7
Report of Actions by San Dieguito Planning Group

Dear Ms. Loy;

The San Dieguito Planning Group (SDPG) voted 12-0-0 at its meeting on May 25, 2006 to request the County to extend the deadline for comment for four weeks to allow enough time to properly review the final EIR. Neither SDPG nor the public was allowed enough time to review this document. This very important document, dated March 17, 2006, did not arrive at our Group until Thursday, May 25, 2006. Scheduling the Planning Commission's review of this document for Friday, June 2, 2006 does not allow enough time for us to make further comment and it is in direct conflict with California Code of Regulations, Article 13, Items 15200 through 15204 regarding the importance of public participation in the review process. Additionally, an adjacent neighbor who sent comments on the draft EIR never received a notice of the hearing. In checking with DPLU, she was advised that the EIR would not arrive at the public library until Friday, May 26, 2006, the due date for public comment, which also does not provide the public notice, as required. Our response to the draft EIR in a letter dated August 9, 2005 was quite extensive with 53 points. This short time frame prior to the Planning Commission hearing does not allow us to research for adequate response. Since it took the respondent 9-1/2 months to respond to our critical comments, it is reasonable to request an additional 4 weeks to complete the review process.

SDPG-1

By a unanimous vote of 12-0-0, San Dieguito Planning Group recommends this project be denied for the 53 reasons outlined in our letter of August 9, 2005 as well as concerns attached to that letter which were brought forth on March 4, 2004 and September 30, 2004, but not responded to in the Draft or Final EIR. If this project is to move forward, it should be under the existing plan alternative calling for six estate size lots, greater than two acres, on septic. That plan is consistent with the Elfin Forest community, of which these units are a part, since they lie north of the Escondido Creek, the historic boundary between Elfin Forest and Rancho Santa Fe, with access across the Creek by the historic 1880's Butterfield Stagecoach road, now named Via de las Flores.

SDPG-2

SDPG-3

Comment 1: Concerning Response I-3, Notice of Preparation (NOP) published in the

SDPG-4

San Diego Union Tribune is not sufficient for the San Dieguito area, since the paper is for the city of San Diego, and NOP's would not be noticed in that paper as well as in local papers such as North County Times and Rancho Santa Fe Review. In the future, please add those papers to your distribution list for NOP's for San Dieguito to ensure that the public is duly notified.

SDPG-4
Cont.

Comment 2: Concerning Responses I-5 and I-11, since Lennar numbered the Units from 1 to 7, and owns land abutting those projects, it may be assumed with reasonable certainty that Lennar plans to continue with more units. Moreover, merely saying that the northern parcels are for Open Space is part of Lennar's stock and trade, in that it goes back on its word, vacating open space for more high-density units, as evidenced in the promise to the neighbors to keep an open space buffer in perpetuity at the end of Unit 6, a promise that yielded unanimous approval from the neighbors. However, when the actual papers were drawn up, the phrase "in perpetuity" was left out. Thus our comment about now is the time to set a standard for review is specific, and must be studied per the growth-inducing concerns of CEQA.

SDPG-5

Comment 3: Concerning Response I-6, Helix did not respond to concerns from SDPG from letters sent to the County Environmental representative from letters dated March 4, 2004 and September 30, 2004. These were subsequently attached to the letter from August 9, 2005, but were ignored in the Final EIR.

SDPG-6

Comment 4: Concerning Responses I-8, I-9, I-10 and I-11, Using Attachment 7, LAFCO map of CSA 107, is a self-serving hyperbole used by the developer to obscure the identity of the land in question, in order to change the properties' community character. CSA 107 is just that, a county service area for fire, medical and emergency services. The Elfin Forest Fire Department historically has served the area in question, not the Rancho Santa Fe Fire District. This map was used to avoid responding to SDPG's and the public concerns about natural geographic and historic boundaries of Escondido Creek. CSA 107 does not determine land use nor equate to the reality of historic identity of the community and the preparer should not have used it to do so. As approximately 40 clustered DU's, the proposed project will shed more light than the alternative project, 6 estate DU's. The project lies within the Elfin Forest Community Plan, as a subset of the San Dieguito Community Plan, and prohibits sewer, and is growth-inducing in the proposed form. See Comment 2 for growth-inducing reasoning based on past history by Lennar on this project.

SDPG-7

Comment 5: Concerning Response I-15, Trail Segment 57 used to connect to Trail Segment 24 and 28, outside The Bridges' chain link golf course fence, along Via de las Flores and Aliso Canyon Road, and was illustrated in Lennar's Santa Fe Creek and The Bridges' Specific Plans. Project approval conditions including these trail segments and were duly noted in SDPG's motions over the years. The developer held community meetings with neighbors promising trails that would skirt the project. DPW and the developer erased a vital segment when they widened Via de las Flores, thus interrupting the trail. In good faith, the developer should move back the chain link fence to reestablish this historic pathway which has been in

SDPG-8

use since the 1880's.

SDPG-8
Cont.

Comment 6: Concerning Responses I-16 and I 17, the fact that the developer is proposing vacation of biological open space in Unit 6 sets the precedent for him vacating other, future biological open space, and as such, is a real concern for SDPG and the neighbors, and warrants acknowledgment and study.

SDPG-9

Comment 7: Concerning Response I-18, indeed, SDPG was referring to Unit 7, not Unit 6. However, saying that the alternative project would damage gnat catcher habitat bears more study, because the alternative could place open space restrictions on the 6 lots, thereby impacting the habitat less than the activity of 37 lots and related traffic thereto. Much precedent exists in San Dieguito where open space restrictions are placed on estate lots, thereby satisfying preservation of such habitat.

SDPG-10

In particular, we note the following errors and omissions, and submit the following comments:

SDPG responded to the notice of preparation of the EIR on both March 4, 2004 and September 30, 2004. Since perhaps SDPG's recommendation and minutes were not forwarded to Helix, many issues raised in our hearings were not included in the DEIR. Giving Helix the benefit of the doubt, SDPG attached copies of these previous motions and minutes to our comments of August 9, 2005, but the Final EIR did not address these attachments. For the third time, SDPG requests that all issues raised in said attachments be included in the EIR and affirmatively addressed.

SDPG-11

SDPG rejects the preparer's canned response to many of our concerns, saying that our comments were appreciated but not specific enough for study. It is the duty of the preparer to study and respond to comments from the public, not to fluff off their concerns with vague responses. This very vagueness on the part of the preparer is what gives the public a bad taste in its mouth when large-scale developers come into their community and build projects that fly in the face of community character. Brushing off community concerns is not in the spirit of CEQA.

SDPG-12

The project is incorrectly identified as being in the Rancho Santa Fe community. This gives the public inadequate notice, and misdirects the focus of review to the existing Bridges project rather than the community into which it is moving. The proposed project is historically and geographically within the Elfin Forest community, being both north of Escondido Creek and east of the Olivenhain Community. The historic southern access that crossed Escondido Creek was the 1880's Butterfield Stagecoach route, now existing as Via de las Flores.

SDPG-13

Elfin Forest is a well-established rural community with a strong community character evidenced by estate-sized lots larger than 2 acres, numerous community trails and over 50% of the homes having horse and large animal keeping facilities.

SDPG-14

The Bridges' project does not comply with the Elfin Forest Community Plan, as it is on lots smaller than 2 acres, is a gated and walled community, is served by sewer instead of septic, lacks recreational trails as required by the Community Trails Plan and Map, lacks ability to keep large animals, and does not comply with the Dark Skies Policy. The group requests that a chapter on community character be added to the EIR addressing these issues.

SDPG-14
Cont.

The project will be the first project to bring sewer across Escondido Creek into the Elfin Forest community. The growth inducements caused by this are not addressed in the DEIR. Furthermore, LAFCO has recently completed a sphere study and DID NOT add the project to the Rancho Santa Fe Community Service District service area. It is SDPG's understanding that the RSF CSD will have to upgrade and increase its capacity to serve the project. The current capacity and plans for expansion of the RFSCSD need to be added to the EIR.

SDPG-15

The draft also fails to discuss growth-inducing aspects as they relate to other Lennar-owned or controlled properties that could be reached from these units, or adjacent properties that might seek to annex their properties to the Bridges once there are roads built into the area from the existing units.

SDPG-16

The only proposed access is from Aliso Canyon Road. A secondary emergency access is proposed via Bumann Road to the north into the Olivenhain community. SDPG has asked that a second northern access be provided to Canyon Del Oro. This access is needed to relieve traffic in the Rancho Santa Fe area and provide a more direct route to the Encinitas Schools that serve much of the project. This will also allow access to the grocery stores, restaurants and other services in San Elijo Hills that are closer to the project than Escondido or Encinitas. Emergency service response time also must be addressed with and without a Canyon del Oro access. The access via Canyon Del Oro is already deeded to the property and exists as a dirt road. A detailed analysis of this deeded access, as a full time northern access, must be added to the EIR.

SDPG-17

SDPG-18

The EIR should include recalculation of emergency response times utilizing the Elfin Forest/Harmony Grove Fire Department as responders with a northern access. The proximity of northern services should be discussed in detail, since it points to this property's relationship to Elfin Forest rather than Rancho Santa Fe.

SDPG-19

The Elfin Forest community, as well as the Olivenhain and Rancho Santa Fe Communities, is very proud of its trail system. The project will remove miles of existing trails that have been in use for decades, labeled as Number 57 on the Community Trails Map. Community trails must be added to every proposal and addressed in the EIR as a part of the Recreational Element. The project also borders the City of Encinitas Olivenhain community. Olivenhain also has a trails and an approved trails plan. The applicant must provide for trails that connect Olivenhain and Elfin Forest, as they exist today, and the EIR must fully detail these issues.

SDPG-20

Vacation of the previously dedicated biological open space in Unit 6 and for

SDPG-21

the driving range is very controversial and has not been supported by the SDPG on several occasions. This sets a very frightening precedent in what is commonly called "Gnatcatcher Central." It would open the door for future vacation of hundreds of acres of dedicated biological open space. SDPG requests a detailed analyses of impacts on open space should other dedicated open space parcels in the core area are vacated. This should include detailed biological assessments, impacts of loss of core habitat and its affect on sensitive species.

SDPG-21
Cont.

SDPG-22

The analysis regarding the biological impact of current zoning (5 homes) in Unit 6 is lacking details and does not provide proof that 5 homes would cause more environmental damage than the 36 homes in the preferred plan. Include in the new analysis traffic, septic system use, human activity, fringe effects, effects on sensitive species, degradation of the creek and community character issues, etc.

SDPG-23

A very large number of the problems or opposition to this project come from the vacation of the open space in Unit 6. The proposed bridge and sewer from Unit 6 to Unit 7, passing through the proposed open space vacation, causes problems for the neighbors in that it removes the buffer agreed upon unanimously by the neighbors as a condition for subdivision in their support of the project. Density was calculated based on open space that is to be vacated in both Unit 6 and for the proposed modification to the driving range. The sewer causes problems for the Elfin Forest community as mentioned above. The EIR needs to demonstrate the effects of traffic passing less than 10 feet from the project's boundary, and indicate traffic along the proposed bridge from potential future units, since Lennar owns other contiguous parcels with Unit 7. It must show analysis of alternative access to building this bridge, and other potential sites for a bridge, such as the historic 1880 Butterfield Stage Route that crosses Escondido Creek, now known as Via de las Flores.

SDPG-24

SDPG-25

SDPG-26

SDPG-27

SDPG-28

School District Analysis needs to be included in the DEIR, as it will affect the Circulation Element. All of Unit 6, Unit 5, about 7 homes in Unit 4 are in the Encinitas elementary school district, and as such will need a convenient route to the Olivenhain Pioneer Elementary School. Units 1-3, part of Unit 4, and Unit 7 are in the Rancho Santa Fe Elementary School District. Units 1-7 are in the La Costa Canyon High School district. Include in the Circulation Element the traffic generated by trips to the schools, as there are no school buses, both before and after school, including after-school activities.

SDPG-29

Circulation Element neglected to address the traffic generated on local roads in the Rancho Santa Fe community that will be and are being used as bypass roads by Bridges' residents to traffic avoidance to LOS F Del Dios Highway. Some roads to include in the circulation element are El Camino del Norte, Lago Lindo, Avenida de las Acacias, El Montevideo, Via de Fortuna, etc. Figure 1.1-14 does not show how the project will usually be traveling, such as further south into the Rancho Santa Fe community; please include the above.

SDPG-30

Section 3.5 Other Cumulative Effects includes the widening of Aliso Canyon

SDPG-31

Road to 40 feet. However, the DEIR neglected to mention that the right of way along Aliso Canyon Road is a trail dedicated to the County for riding and hiking. Equestrian usage of this trail, or any other trails, was not mentioned in the DEIR. Please include study of the effect of a 45 MPH road next to the trail, as well as if it is even possible to widen Aliso Canyon Road due to the trail dedication. It will also need to discuss the effect of increased traffic and speeds on the possible elementary school on this road.

SDPG-31
Cont.

The Driving Range modification shows a spur going down the bank toward Escondido Creek. Analyze whether this spur could be eliminated. Irrigation of the bank of Escondido Creek to establish non-native grass will cause runoff of chemically loaded water into the fresh water creek and lagoon. Even the best storm water management measures are unlikely to mitigate for excess water, chemicals, golf balls, etc. that will go into Escondido Creek as well as the San Elijo Lagoon, inducing growth of non-native invasive vegetation. Analyze alternatives to the proposed golf course driving range that will avoid impacting the Escondido Creek and the San Elijo Lagoon.

SDPG-32

SDPG-33

The fence surrounding the project is not neighborly. It is a 6 ft. chain link fence topped with a 3-strand barbed wire arm tilted toward the neighbors, in the same style as used for military installations and heavy equipment storage yards. Lennar's former representative, John Slatton, while wooing the neighbors' support of the project, promised that The Bridges would be a good neighbor and install a representative rural wooden fence, consistent with community character, as well as dedicate in perpetuity the open space in Unit 6. Lennar did not obtain a variance for the 3-strand barbed wire addition to its chain link fence. Such a fence cuts off the biological corridor and is not necessary, as numerous other golf courses in the area use open wooden fences, including but not limited to Rancho Santa Fe Golf Club, Morgan Run Golf Course, and Lomas Santa Fe Golf Course. Analyze the impacts of this non-code fence versus an open wooden fence on area wildlife, such as but not limited to deer, since Units 6 and 7 are in a wild life corridor.

SDPG-34

SDPG-35

Analyze how Open Space in Perpetuity, as guaranteed by Lennar as a condition of subdivision for Unit 6, may now be vacated. Buying mitigation land at 2:1 doesn't mitigate to the surrounding neighbors who agreed to the conditions of subdivision; it is an admission of guilt that the property to be vacated is indeed valuable, tantamount to a bribe to the County and its environmental agencies. It is the opinion of SDPG, as stated at more than one hearing, that the integrity of the conditions of subdivision for Unit 6 must be upheld. Analyze how Lennar can mitigate to the neighbors due to their loss of faith in the developer; loss of property value and quality of life; loss of view shed; light transmission due to headlights and landscape lighting; traffic generated less than 10 feet from boundary that prohibits adequate screening for noise, headlights, etc. Lennar claimed that there was no agency to which to dedicate the open space, and that, as a result, it could vacate it. Neighbors have indicated a willingness to be responsible for it. Analyze the alternatives where Lennar or the neighbors maintain the open space. Determine whether The Escondido Creek Conservancy was approached by Lennar

SDPG-36

SDPG-37

SDPG-38

to manage the open space.

SDPG-38
Cont.

The EIR needs to analyze what would happen if Roundabouts were never built, or if built what would be done if they were later removed.

SDPG-39

Analyze grassland mitigation. Unit 7 has extensive grassland that will be eliminated by the project.

SDPG-40

In light of the recent U.S. District Court ruling by Judge Laurence Karlton a chapters are needed for each proposal that identifies how the proposed projects would a) harm and b) increase or recover the endangered species found on the property (NRDC et al v. Rogers).

SDPG-41

The following comments are figure specific and must be addressed in the EIR:

Figure 1.1-3 The driving range area is not clear, thus the figure is confusing.

SDPG-42

Figure 1.1-4 Unable to identify the limits of grading for the proposed driving range.

SDPG-43

Figure 1.1-5 Information on existing rights of way and easements are missing for Units 6 and 7.

SDPG-44

Figure 1.1-6 Open Space identified by a darkly shaded area is improperly identified, should be identified as a fuel modification zone. The limits of its biological and environmental worth must be discussed in the body of the EIR. Furthermore, Fuel Modification zone acreage must not be included in the mitigation calculations.

SDPG-45

Figure 1.1-7a List the current zoning and density for each legal, existing lot with the County Resource Ordinance steep slope calculation.

SDPG-46

Figure 1.1-7b Please explain the notation that reads, "Recreational Open Space, doc 1999-0708520." Attach a copy of said document to the EIR.

SDPG-47

Figure 1.1-8a The actual size of the slopes are not identifiable. No "topo" line elevations are included.

SDPG-48

Figure 1.1-8b Note the easement that travels in a northern direction. Add a proposal utilizing this deeded access.

SDPG-49

Figure 1.1-10a Need larger "topo" line numbers, as reader is unable to decipher the elevation changes.

SDPG-50

Figure 1.1-10b This entire figure is too small to decipher and is

SDPG-51

confusing. Needs a legend with a listing of the amount of acres in each area that is requested to be vacated.

SDPG-51
Cont.

Figure 1.1-10c Need more native oaks and other native plants in this landscape plan.

SDPG-52

Figure 1.1-12 Add a pathway trail on bridge for golf carts and trail users.

SDPG-53

Figure 1.1-13a Does the applicant have deeded rights to Bumann Road? Identify what properties have given deeded access and those that have not.

SDPG-54

Figure 1.1-14 This circulation map lacks identifying street names in the communities of Elfin Forest, Olivenhain and Rancho Santa Fe. This map must be revised with names of these local, existing streets that will serve the project, especially showing streets further south to Del Dios Highway. Streets that need to be identified include, but are not limited to, Del Dios Highway, Fortuna Del Este, Canyon del Oro, Elfin Forest Road, Via de las Flores, El Camino Del Norte, Lago Lindo, El Montevideo, and Via de Fortuna. Also, indicate where the following schools are located, so that routes to school may be identified: Rancho Santa Fe Elementary, Olivenhain Pioneer Elementary and La Costa Canyon High School.

SDPG-55

SDPG-56

SDPG is very concerned that the amount of revisions needed to the DEIR is excessive. Combined with the failure of the applicant to provide notice to the neighbors and the failure of the applicant to include the SDPG's and others' input taints the document.

SDPG-57

It is respectfully requested that another DEIR, with the above revisions, be circulated with another 45-day public review period for comment before this project is allowed to proceed further through the permit process.

SDPG-58

Sincerely,

Paul Marks, Chair
San Dieguito Planning Group

PDM:tih

cc: Gary Pryor
Bill Horn

PAUL MARKS
CHAIR
(760) 489-0900

SAN DIEGUITO PLANNING GROUP

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San Diego County Planning Commission
5201 Ruffin Road, Suite B
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Re: **The Bridges Unit 6 & 7/** SPA 01-004, TM 5270RPL2, P85-084W5, P85-064W4; The Bridges' Unit 7/TM 5239RPL4, AD 01-001, S 01-077; Santa Fe Creek/SPA 03-006; FEIR

Dear Commissioners:

The San Dieguito Planning Group (SDPG) believes that the current FEIR is fatally flawed, requires extensive revisions and thus should be extensively revised and re-circulated as a DEIR. Due to the many flaws identified by over 63 pages of public comments, including from both Federal and State agencies, SDPG finds the project requires extensive revisions and work before a cognizant FEIR could be brought before the Commission, and be denied in its current form.

SDPG-59

Attached are copies of the motions from our meeting of June 22, 2006, opposing the project and the Final Environmental Impact Report.

SDPG-60

SDPG heard the proposed project on March 4, 2004, September 30, 2004, August 4, 2005, May 25, 2006 and June 22, 2006. The DEIR was discussed in length at the August 2005 meeting resulting in a 7-page response with 53 specific comments. At this meeting the Planning Group also requested the DEIR be revised to include the issues raised in the August letter and be re-circulated. At the May 25, 2006 meeting, SDPG voted to ask for a continuance to afford adequate time to review the massive FEIR. At the June 2006 meeting, motions were passed to deny the project; the motions are attached. Below you will find further discussion of this project from SDPG.

SDPG-61

The Fish and Wildlife Service does not support the project and specifically stated the project as proposed is "not consistent with ongoing regional habitat conservation planning." (Comment A-2) The Service also stated that the offsite mitigation properties identified have not shown to be able to support 5 pairs of gnatcatchers. The Service indicated the amount of mitigation land offered is not sufficient for the proposed project and has asked for mitigation land that would support 22 pairs of gnatcatchers. (Comment A-3) SDPG joins the Service with these concerns.

SDPG-62

The California Department of Fish and Game submitted extensive comments. The Service strongly recommended that the project be reconfigured to reduce impacts to the gnatcatcher, gnatcatcher habitat and the NCMSCP preserve design. (Comment C-4) The Department felt that either a 13- or 14-unit project was more appropriate for the location (Comment C-6) or that the development footprint be made smaller (Comment

SDPG-63

C-7). The mitigation lots identified are not large enough to be biologically viable (Comment C-9). Mitigation Lot C is already open space (Comment C-10 and Comments from the City of Carlsbad), and therefore should not be counted as open space for this project. The Department feels that the Existing Plan Alternative is viable and would work with the applicant (Comment C-13). The Department did not approve of the proposed vacation of dedicated open space, "We would like to believe that conservation approved under the NCCP agreements is permanent" (Comment C-4). SDPG joins the Department with these concerns.

SDPG-63
Cont.

The Local Agency Formation Commission (LAFCO) does not support the project. Comments include the failure of the EIR to adequately discuss the growth inducements of bringing sewer into the rural area north of Escondido Creek (Comment E-5). LAFCO pointed out that an appropriate agency to serve the project was not identified and a Special Study Area designation has been placed on the project area (Comment E-4). Neither the Rancho Santa Fe CSD nor Encinitas "had demonstrated the capability to serve the site" (Comment E-4). SDPG joins LAFCO with these concerns.

SDPG-64

LAFCO named Escondido Creek as the northern boundary for Rancho Santa Fe when reviewing Rancho Santa Fe incorporation proposals in December 1986, and reiterated that boundary during the recent incorporation study of 2005-06. SDPG insists that the proposed project is in Elfin Forest, not Rancho Santa Fe, and as such, the project should conform to the community character of Elfin Forest. The Cielo del Norte project used this boundary, as did the Onyx Ridge and Santa Fe Creek projects. Elfin Forest is a rural residential community with its own stated community character that is not addressed in the FEIR.

SDPG-65

The Rancho Santa Fe Fire Department requested that a second emergency route be built (identified as the northerly route), but the northern route was not included in the DEIR and does not connect to a public road. The northern route ends at the intersection of a locked gate and a pipeline service road owned by the Olivenhain Municipal Water District (OMWD). The applicant does not have the legal right to use the service road. Should the northern road be extended past the OMWD service road and gate, the route would traverse Paint Mountain Road, which is a private road. Although the emergency access road to Buman Road should have been required to be the standard width of 24 feet, the development agreement (Page 5, #d) allows for an 18-foot wide access road. SDPG does not believe this is safe and requests that the road is built to a minimum width of 20 feet.

SDPG-66

The Fire Department intends to designate the proposed project as a "shelter-in-place." SDPG has grave concerns about utilizing shelters-in-place in the middle of a habitat mitigation bank that is slated to grow into thousands of acres. The response time from the Rancho Santa Fe Fire Department exceeds safety standards. Since the Elfin Forest Fire Department would be able to respond within safety standards, it should be the designated service provider. Complete and detailed discussions of the northern route, shelter-in-place and response times should to be included in the FEIR.

SDPG-67

SDPG wishes to express its concern in granting a vacation of open space in a core habitat preservation area. The biological value of this core habitat is excellent. The extra housing units proposed for Unit 6 are on land that was required to buffer the northern neighbors from the walled and gated Bridges development. The need for a buffer has not changed. Furthermore, the configuration of the added units is inconsistent with the units directly to the south within the Bridges. The lot configurations and building restrictions make it very difficult to develop the lots. The discussion of these issues is not adequately addressed in the FEIR.

SDPG-68

SDPG was pleasantly surprised to see that several community trails were added to the project, see FEIR Attachment 8. This calls for Trail #57 in the open space north of Unit 7. Should a second northern emergency route be finalized, Trail #57 could be placed on this route to lessen environmental impacts, as would utilization of existing dirt roads and utility easements. However, please include SDPG's Trail Committee in the selection process prior to final selection of specific trail alignments associated with the development. Finally, since no requirement to dedicate and build Trail #57 was found in either the development agreement or the Major Use Permit, dedication and building requirements must be added.

SDPG-69

A pathway along Aliso Canyon Road (Trail/Pathway #23 of the Community Trails Map) is required per the development agreement, Page 6, #k, and draft major use permit, Page 2, # 3 (Pages 2-29 and 2-54 and of the 06-02-06 handout). Please add the Director of Parks and Recreation after "and disintegrated granite pathway/walkway to the satisfaction of the Director of Public Works."

SDPG-70

The applicant is required to dedicate Avenida del Duque, (Page 2 of the draft major use permit and Page 2-54 of the 06-02-06 handout). However, Avenida del Duque is missing a requirement for dedication and building the trail/pathway (Trails #25 and 26 of the Community Trails map). SDPG requests that language requiring dedication and building the above mentioned trails and pathways (#25, #26, #57) be added to both the development agreement and Major Use permit.

SDPG-71

The Habitat Management Plan, also know as the Recourse Management Plan, must be reviewed by SDPG for comments and revision prior to approval by the county and resource agencies. A statement that allows for trails in the open space must be included in the document. Omissions of this statement and unenforceable management steps have been issues with other developments in the area in the past. SDPG would like to avoid another contentious battle with a developer, if possible.

SDPG-72

CEQA requires that cumulative impacts of further development be studied. Since the applicant owns more property in the area, the FEIR should address the cumulative impact of further development by this applicant. Whether the land is to be designated as open space should not figure into this, since the applicant has a history of seeking vacation of open space to expand his project, as shown in this very application.

SDPG-73

Regarding traffic and road mitigation, SDPG has stated on several occasions that a northern unrestricted access route should be utilized to reduce traffic impacts in the Rancho Santa Fe area. This is especially important as many of the Bridges lots are in the Encinitas School District. Moreover, the draft developer agreement and draft Major Use Permit left out the mitigation funds for the roundabout and/or other traffic control device at the corner of Aliso Canyon Road and El Camino del Norte. This must be addressed since currently all of the traffic from this purposed project has to go through this intersection to access the project.

SDPG-74

SDPG-75

Thank you for the opportunity to address your commission regarding this contentious proposed project.

Sincerely,

Paul Marks
Chair, San Dieguito Planning Group

Cc: Bill Horn, Supervisor, County of San Diego
Bill Stocks, Senior Planner, Department of Planning and Land Use
Maggie Loy, Environmental Analyst, Department of Planning and Land Use

SAN DIEGUITO PLANNING GROUP	
SDPG-1	The requested continuance was granted.
SDPG-2	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction, and Response to Comment CBI-1.
SDPG-3	Refer to Response to Comment SDPG-2.
SDPG-4	Refer to final EIR Responses to Comments I-3 and I-7.
SDPG-5	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. The references to other open space near Unit 7 are not applicable to Alternative C. However, the County's language in all Open Space Easements will include the phrase "in perpetuity" to ensure permanence for these conservation areas.
SDPG-6	Refer to final EIR Response to Comment 1-3. All of the issues in the March 4, 2004 and September 30, 2004 letters were reviewed and they raised no new environmental issues above and beyond what was evaluated in the draft EIR. The purpose for the Notice of Preparation is to alert responsible agencies and public about a pending project and solicit input on potential environmental issues and topics.
SDPG-7	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. As to Alternative C, sewer is already available to serve Unit 6. See Response to Comment EFTC-15.
SDPG-8	The proposed project does not include the trail referred to by the commentor. See Response to Comment I-15.
SDPG-9	The proposed project includes on- and off-site mitigation for biological resource impacts, requiring the dedication of lands to Biological Open Space Easement in perpetuity. The language for these easements will require the term "perpetuity. See final EIR Responses to Comments G-4 and G-5.
SDPG-10	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction and Preface. Thus, the comment no longer applies with respect to Alternative C.
SDPG-11	Refer to Response to Comment SDPG-6, above.
SDPG-12	The County does not agree with this comment. The Responses to Comments have been completed according to the requirements of CEQA using the best information available. In instances in which a comment repeats the substance of an earlier comment, cross-referencing was utilized to limit redundancy.
SDPG-13	<i>The remaining comments reflected in the May 26, 2006 letter written by Paul Daniel Marks on behalf of the San Dieguito Planning Group (SDPG) (SDPG 13-53, inclusive, below) are verbatim to the comments in the August 9, 2005 letter written by Paul Daniel Marks (final EIR letter "I"), submitted as part of the public review comments on the draft EIR. As such, the following references are to the final EIR Responses to Public Comments. County staff believe the final EIR responses are adequate and still apply.</i> Refer to final EIR Response to Comment I-8.
SDPG-14	Refer to final EIR Response to Comment I-9.

SDPG-15	Refer to final EIR Response to Comment I-10.
SDPG-16	Refer to final EIR Response to Comment I-11.
SDPG-17	Refer to final EIR Response to Comment 1-12.
SDPG-18	Refer to final EIR Response to Comment I-13.
SDPG-19	Refer to final EIR Response to Comment I-14.
SDPG-20	Refer to final EIR Response to Comment 1-15.
SDPG-21	Refer to final EIR Response to Comment I-16.
SDPG-22	Refer to final EIR Response to Comment 1-17.
SDPG-23	Refer to final EIR Response to Comment 1-18.
SDPG-24	Refer to final EIR Response to Comment 1-19.
SDPG-25	Refer to final EIR Response to Comment I-20.
SDPG-26	Refer to final EIR Response to Comment I-21.
SDPG-27	Refer to final EIR Response to Comment I-22.
SDPG-287	Refer to final EIR Response to Comment I-23.
SDPG-29	Refer to final EIR Response to Comment I-24.
SDPG-30	Refer to final EIR Response to Comment 1-25.
SDPG-31	Refer to final EIR Response to Comment I-26.
SDPG-32	Refer to final EIR Response to Comment I-27.
SDPG-33	Refer to final EIR Response to Comment 1-28.
SDPG-34	Refer to final EIR Response to Comment I-29.
SDPG-35	Refer to final EIR Response to Comment I-30.
SDPG-36	Refer to final EIR Response to Comment I-31.
SDPG-37	Refer to final EIR Response to Comment I-32.
SDPG-38	Refer to final EIR Response to Comment I-33.
SDPG-39	Refer to final EIR Response to Comment I-34.
SDPG-40	Refer to final EIR Response to Comment I-35.
SDPG-41	Refer to final EIR Response to Comment I-36.
SDPG-42	Refer to final EIR Response to Comment I-37.

SDPG-43	Refer to final EIR Response to Comment I-38.
SDPG-44	Refer to final EIR Response to Comment I-39.
SDPG-45	Refer to final EIR Response to Comment I-40.
SDPG-46	Refer to final EIR Response to Comment I-41.
SDPG-47	Refer to final EIR Response to Comment I-42.
SDPG-48	Refer to final EIR Response to Comment I-43. .
SDPG-49	Refer to final EIR Response to Comment I-44.
SDPG-50	Refer to final EIR Response to Comment I-45.
SDPG-51	Refer to final EIR Response to Comment I-46.
SDPG-52	Refer to final EIR Response to Comment I-47.
SDPG-53	Refer to final EIR Response to Comment I-48.
SDPG-54	Refer to final EIR Response to Comment I-49.
SDPG-55	Refer to final EIR Response to Comment I-50.
SDPG-56	Refer to final EIR Response to Comment I-51.
SDPG-57	Refer to final EIR Response to Comment I-52.
SDPG-58	Refer to final EIR Response to Comment I-53.
SDPG-59	The County does not agree with this comment. See Response to Comment EFTC-1.
SDPG-60	Comment noted.
SDPG-61	Comment noted. The requested extensions were granted.
SDPG-62	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction and Preface. See also Response to Comment CBI-1.
SDPG-63	See Response to Comment SDPG-62. See also final EIR Responses to Comments G-4 and G-5.
SDPG-64	Annexation is not required for Unit 6. With the withdrawal of the Unit 7 Project, this comment does not apply to Alternative C. Refer to final EIR Response to Comment E-1.
SDPG-65	The project is not within Elfin Forest boundaries. See Response to Comment EFTC-13. Alternative C has significantly fewer impacts than the Proposed Project. See Introduction. Alternative C describes the new preferred project of which the Applicant is seeking approval. Impacts from the development of Unit 6 and the golf course driving range reconfiguration are analyzed in Alternative C, as discussed in Chapter 4.6 of the final EIR, and all impacts have been mitigated to a level below significant. Refer to Introduction and Preface. The proposed Unit 6 development will be 5 large lots, with low density, residential estate homes, and will be compatible with the surrounding area including the residential community of Elfin Forest.

SDPG-66	To the extent that the comment refers to the northern access route proposed as part of Unit 7, it no longer applies since Unit 7 has been withdrawn. Refer to Introduction, and to Response to Comment EFFD-1. To the extent that the comment refers to the emergency access to Unit 6 via Bumann Road, this is discussed in the final EIR Chapter 4.6 and has been determined to be adequate. See Response to Comment EFTC-7.
SDPG-67	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. The comment does not apply to Alternative C. See also final EIR Response to Comment E-1.
SDPG-68	Refer to final EIR Responses to Comments G-4 and G-5.
SDPG-69	The comment referred to trails in connection with Unit 7, which has been withdrawn. See Introduction, and Response to Comment CBI-1. There are no trails proposed as part of Alternative C.
SDPG-70	Refer to Response to Comment SDPG-69.
SDPG-71	Refer to Response to Comment SDPG-69.
SDPG-72	Comment noted. As noted, the County of San Diego Department of Planning and Land Use is responsible for the review and approval of the long-term Habitat Management Plan and the provisions within the associated conservation easement deeds and management agreements. The comment with respect to trails is not applicable to Alternative C. See also Response to Comment SDPG-69.
SDPG-73	The analysis of cumulative impacts was conducted by the County in accordance with CEQA. The cumulative projects evaluated in the draft EIR were those projects that were known or pending based upon contact with the County of San Diego and City of Encinitas. Known or pending projects include those projects with applications on file with the lead agency. The future of properties for which no application is on file is purely speculative.
SDPG-74	This comment refers to the northern access route, which was part of the Unit 7 Project, which has been withdrawn. See Introduction. The comment does not apply to Alternative C.
SDPG-75	The traffic impacts for Alternative C are discussed in the final EIR in Chapter 4.6, as are the mitigation measures. The applicant will be conditioned to contribute to the TIF for its share of traffic impacts. Refer also to Response to Comment RSF-2.

ATTACHMENT D

January 15, 2008

Board of Supervisors
County of San Diego
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

**Re: Re: The Bridges Unit 6 and Driving Range Expansion: SPA
01-004, TM 5270RPL2, P85-084W, P85-064W, B/C 03-0250,
B/C 03-0221; Santa Fe Creek: SPA 03-006, VAC 03-00018;
Final Environmental Impact Report**

Dear Supervisors:

On behalf of the Staff, this Memorandum responds to the various points contained in the letter submitted by Everett L. Delano III, attorney for The Escondido Creek Conservancy and the Elfin Forest/Harmony Grove Town Council (the "DeLano Letter") immediately prior to the December 14, 2007 Planning Commission hearing on the Bridges Unit 6 and Driving Range Expansion (as described above, the "Project").

1. The DeLano letter objects that the Final EIR contains discusses Unit 7 in addition to Unit 6 and the Driving Range expansion, although Unit 7 has been withdrawn and will not be developed.

Response: The Preface to the FEIR explains the current proposed Project is Alternative C, which does not include Unit 7. The discussion cited in the DeLano letter was in connection with the original project or the prior alternative projects which included Unit 7, not Alternative C. The Preface further explains that Alternative C is a subset of the original project, containing components which were essentially identical when contained within the original project. Further, all the impacts were discussed in the Draft EIR. Alternative C is thoroughly explained and discussed in Chapter 4.0 of the Final EIR. The Preface to the FEIR also says to disregard all discussion as to Unit 7, since it has been totally withdrawn.

2. The DeLano letter states that it is unclear "whether and ... to what extent the driving range expansion will or will not include portions of Unit 7." The letter bases this comment on the statement in the Preface to the Final EIR that Unit 7 will not be developed, but that the driving range expansion will include property "boundary adjusted out of Unit 7."

Response: There is nothing unclear about the Final EIR. The reference to Unit 7 is a convenient shorthand and does not indicate that Unit 7 will be developed. The driving range expansion has always included a portion of the property that is being carved out of Unit 7 by a boundary adjustment to create Parcel "A.". This portion of property is still proposed as part of the driving range expansion. This is

no change. It is accurate (and not a change) to state that this portion of property will be "boundary adjusted into the driving range and The Bridges Specific Plan." The remainder of the property that was included in Unit 7 is what had been proposed for the residential development generally referenced as the Unit 7 development, and the application for that residential development has been totally withdrawn, all as explained in the Preface to Final EIR.

3. The DeLano letter states that it is unclear how the need for imported material would be addressed, citing to the original project description at page 1-7 of the Draft EIR.

Response: At page 4-14, the Final EIR explains that the Project "would result in a demand for approximately 2,700 c.y. of imported material. It is anticipated that this relatively small amount of import needed for the driving range and emergency access road will be accommodated by off-site resources. The route used for import is anticipated to be from I-15, Del Dios Highway, north on El Camino del Norte and Aliso Canyon Road, west on Avenida del Duque and entrance to The Bridges from an existing truck access to Stellina which intersects with Calle Ponte Bella." Final engineering plans will be prepared to conform to the quantities stated in the FEIR. No significant unavoidable adverse impacts are anticipated to result from this small amount of import.

4. The DeLano letter asserts that it is "unclear which, if any, of the mitigation measures discussed in the FEIR will be accomplished."

Response: The mitigation measures applicable to the proposed Project are all discussed in Chapter 4.6 of the Final EIR, and are all listed in Chapter 9.0 of the Final EIR.

5. The DeLano letter also asserts that it is unclear whether revegetation of graded slopes along the Escondido Creek will occur under Alternative C.

Response: At page 4-12, the Final EIR states that "[t]he manufactured fill slope abutting Escondido Creek is proposed to be revegetated with a native hydroseed mix approved by the County to reduce erosion and to re-establish the native habitat found along the existing creek corridor." Environmental Design Consideration/Condition of Approval #6 provides: "The manufactured fill slope adjacent to the proposed golf course driving range will be revegetated with a native hydroseed mix and some container stock, as noted in Figure 4.6-9. The hydroseed and container stock application to the fill slope is proposed to reduce erosion and to revegetate the slope in-kind to the native habitat found along the

existing creek corridor. The landscape plan shall be approved by the County and shall be monitored for two years to ensure establishment. Established vegetation covering the fill slope is proposed to have a 70 percent coverage, as compared to the native background plants.”

6. The DeLano letter states that “the FEIR’s discussion of mitigation is vague. It is difficult to tell which mitigation parcels will be used and, of these, which portions of those parcels will be used.”

Response: The Draft EIR established criteria for mitigation parcels which could have been met by any of three listed parcels. This is adequate to comply with the requirements of CEQA. However, since publication of the DEIR, it has been determined that the off-site mitigation for the proposed project will occur on the southern portion of the Alamere parcel, as well as a small additional portion on the western side of the Onyx Ridge parcel. These are discussed specifically in the FEIR and the Errata Sheet.

7. The DeLano letter asserts that “[a] prior EIR determined that open space was important to reduce visual impacts. The FEIR claims that this same open space can be vacated, yet there is no discussion as to whether and how conditions have changed since the adoption of the prior EIR. If the open space was important previously, it should be important today unless factors have changed significantly.”

Response: The original mitigation measure set forth the circumstances under which the easement could be vacated, which included preservation of an alternative native landscape. This is all discussed in detail in Attachment 6 to the FEIR, as well as in Response to Hearing Letter Comments BRUN-7. In addition, the Final EIR concludes that vacation of the open space easement is consistent with CEQA.

8. The DeLano letter argues that: “The proposed findings for the vacation of open space are inconsistent with Policy I-103. ... the purpose behind the original dedication of open space was to have an area free of development that was within the viewshed of surrounding properties. The development of Unit 6, even if it with “compatible” residences, takes away the open space purpose served by the easement.”

Response: The vacation was contemplated by the Board of Supervisors at the time it was imposed. As discussed in great detail in Attachment 6 to the FEIR and in Response to Hearing Letter Comments BRUN-7, the proposed vacation is

consistent with that contemplation of the Board and the proposed vacation is consistent with the requirements of Policy I-103 and CEQA.

9. The DeLano letter questions the County's conclusions as to the biological value of Unit 6: "Additionally, the proposed findings for the vacation of the open space easement suggest that the biological value in Unit 6 has declined since it was originally set aside, but there is inadequate evidence to show how or why it has declined. If the alleged declined value of the biological open space is associated with the applicant's management of this open space, the applicant should not be rewarded for such a decline, which is likely inconsistent with its obligations under current requirements."

Response: The biological value of Unit 6 has declined because it is surrounded by development and isolated from other biological open space. Further, it is no longer as significant because a plant then occurring on site has now been determined to be less rare than thought at the time of the original approval in 1985. The decline in biological value of Unit 6 is not due to the applicant's management of the open space. This is all discussed in Attachment 6 to the FEIR, and also in Response to Hearing Letter Comments BRUN-7.

10. The DeLano letter states: "There is no biological report or other data showing the quality or quantity of sensitive biological species on the Alamere site or how the sight [sic] provides the "same balance.""

Response: An updated biological report has been submitted to the County from Helix dated December 12, 2007 showing the quality and location of sensitive biological species on the Alamere site. A comparison of the habitat, flora and fauna on the Alamere site to Unit 6 demonstrates that Alamere has higher conservation values. The portion of the Alamere site proposed as mitigation contains 45.87 acres. The North County Multiple Species Program (NCMSCP) has mapped the entire 45.87 acres as Diegan coastal sage scrub, a particularly valuable habitat. The Center for Natural Lands Management (CNLM), the manager of the property, has mapped 44.26 acres as high-quality Diegan coastal sage scrub, with the remaining 1.71 acres mapped as chaparral. The Alamere site supports three pairs of coastal California gnatcatchers, with two of the pairs documented as using the southern half of the site. Alamere also supports the following sensitive species: California adolphia; Bell's sage sparrow, California horned lark and the San Diego black-tailed jackrabbit. In contrast, Unit 6 contains 8.27 acres of moderate-quality Diegan coastal sage scrub. The provision of higher-quality habitat as mitigation for vacation of the open space easement over Unit 6 is consistent with both CEQA and Policy I-103.

Further, the County has received a letter from the Center for Natural Lands Management dated January 9, 2008 which attests to the good condition of the site and to the habitat qualities and the various supported species. In addition, the County has received an Email from Susan Wynn at the US Fish & Wildlife Service dated January 10, 2008 which reports that the USFWS has toured the site and approves it as mitigation for the Bridges Unit 6 and the Driving Range. The County has also received an Email from David Mayer at the California Department of Fish & Game dated January 10, 2008 stating that CDFG is willing to trust the judgment of the USFWS and concurs with the USFWS response regarding the site as set forth in Wynn Email of the same date.

11. The DeLano letter objects that the Final EIR has insufficient discussion of the impacts of the proposed vacation, and “it illegally defers appropriate mitigation for impacts to Unit 6.”

Response: The impact of the proposed vacation is fully discussed, and the Final EIR concludes that it is consistent with CEQA. The Final EIR requires dedication of a perpetual easement over 33.08 acres of high-quality habitat at Alamere prior to or concurrent with vacation of the existing open space easement over 8.02 acres at Unit 6. The mitigation will occur prior to any environmental impacts to Unit 6. Therefore, there is no illegal deferral of mitigation for impacts to Unit 6.

12. The DeLano letter asserts that “[t]he Project is likely to have growth inducing effects, which are insufficiently addressed in the FEIR. Among other things, a 15-foot wide sewer easement has recently surfaced and is proposed for an area leading north of Unit 6.”

Response: Alternative C consists of 5 estate homesites, consistent with the approved Specific Plan for the area. The project will not result in any excess capacity or infrastructure to support additional future development. The 15-foot wide sewer easement was erroneously left on the tract map after withdrawal of the Unit 7 application. It was, in essence, a typographical error, and it has been removed from the Tentative Map and other documents.

13. The DeLano letter states: “Similarly, the designation of a ‘recreational open space’ area leading out of Unit 6 and toward Unit 7 indicates that the applicant intends to develop Unit 7 in the future and plans to seek to vacate that open space in order to construct a road into Unit 7.”

Board of Supervisors
San Diego, CA 92123
January 15, 2008
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Response: The left over portion of the Unit 6 area was always to be rededicated as recreational open space, as such to be designated the same as the recreational open space for the golf course which adjoin it. As set forth in the Preface to the Final EIR and Chapter 4.0, the application for Unit 7 has been withdrawn, and with that withdrawal the road which had been shown as connecting into Unit 7 was also withdrawn. The land which would have been part of that connecting road is now being added to the rest of the unused portion of Unit 6 which is not covered by the 6 lots, and becomes part of the recreational open space. Nothing in the proposal to dedicate a recreational open space easement over a portion of Unit 6 indicates plans for future vacation of the open space.

14. The DeLano letter states that the project has been revised significantly and the Final EIR should be recirculated with careful attention to the revised Project and its potential impacts.”

Response: As acknowledged in the DeLano letter, recirculation is only required where new significant information is added to the EIR in a way that deprive the public of a meaningful opportunity to comment. Alternative C is a subset of the project discussed in the Draft EIR and no new information was added that would trigger a requirement to recirculate the DIR under CEQA.

Very truly yours,

Dr. Glenn Russell

cc: Ms. Maggie Loy
Mr. Peter Fagrell
Ms. Patricia Wagner



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Our File Number: 0WBB-114539

January 16, 2008

Board of Supervisors
County of San Diego
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

Re: The Bridges Unit 6 and Driving Range Expansion: SPA
01-004, TM 5270RPL2, P85-084W, P85-064W, B/C
03-0250, B/C 03-0221; Santa Fe Creek: SPA 03-006,
VAC 03-00018; Final Environmental Impact Report

Dear Supervisors:

On behalf of the applicant, HCC Investors, LLC, this letter responds to the various points contained in the letter submitted by Everett L. Delano III, attorney for The Escondido Creek Conservancy and the Elfin Forest/Harmony Grove Town Council (the "DeLano Letter") immediately prior to the December 14, 2007 Planning Commission hearing on the Bridges Unit 6 and Driving Range Expansion (as described above, the "Project").

1. The DeLano letter objects that the Final EIR contains discusses Unit 7 in addition to Unit 6 and the Driving Range expansion, although Unit 7 has been withdrawn and will not be developed.

Response: The Preface to the FEIR explains the current proposed Project is Alternative C, which does not include Unit 7. The discussion cited in the DeLano letter was in connection with the original project or the prior alternative projects which included Unit 7, not Alternative C. The Preface further explains that Alternative C is a subset of the original project, containing components which were essentially identical when contained within the original project. Further, all the impacts were discussed in the Draft EIR. Alternative C is thoroughly explained and discussed in Chapter 4.0 of the Final EIR. The Preface to the FEIR also says to disregard all discussion as to Unit 7, since it has been totally withdrawn.

2. The DeLano letter states that it is unclear "whether and ... to what extent the driving range expansion will or will not include portions of Unit 7." The letter bases this comment on the statement in the Preface to the Final EIR that Unit 7 will not be developed, but that the driving range expansion will include property "boundary adjusted out of Unit 7."

January 16, 2008

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Response: There is nothing unclear about the Final EIR. The reference to Unit 7 is a convenient shorthand and does not indicate that Unit 7 will be developed. The driving range expansion has always included a portion of the property that is being carved out of Unit 7 by a boundary adjustment to create Parcel "A.". This portion of property is still proposed as part of the driving range expansion. This is no change. It is accurate (and not a change) to state that this portion of property will be "boundary adjusted into the driving range and The Bridges Specific Plan." The remainder of the property that was included in Unit 7 is what had been proposed for the residential development generally referenced as the Unit 7 development, and the application for that residential development has been totally withdrawn, all as explained in the Preface to Final EIR.

3. The DeLano letter states that it is unclear how the need for imported material would be addressed, citing to the original project description at page 1-7 of the Draft EIR.

Response: At page 4-14, the Final EIR explains that the Project "would result in a demand for approximately 2,700 c.y. of imported material. It is anticipated that this relatively small amount of import needed for the driving range and emergency access road will be accommodated by off-site resources. The route used for import is anticipated to be from I-15, Del Dios Highway, north on El Camino del Norte and Aliso Canyon Road, west on Avenida del Duque and entrance to The Bridges from an existing truck access to Stellina which intersects with Calle Ponte Bella." Final engineering plans will be prepared to conform to the quantities stated in the FEIR. No significant unavoidable adverse impacts are anticipated to result from this small amount of import.

4. The DeLano letter asserts that it is "unclear which, if any, of the mitigation measures discussed in the FEIR will be accomplished."

Response: The mitigation measures applicable to the proposed Project are all discussed in Chapter 4.6 of the Final EIR, and are all listed in Chapter 9.0 of the Final EIR.

5. The DeLano letter also asserts that it is unclear whether revegetation of graded slopes along the Escondido Creek will occur under Alternative C.

Response: At page 4-12, the Final EIR states that "[t]he manufactured fill slope abutting Escondido Creek is proposed to be revegetated with a native hydroseed mix approved by the County to reduce erosion and to re-establish the native habitat found along the existing creek corridor." Environmental Design Consideration/Condition of Approval #6 provides: "The manufactured fill slope adjacent to the proposed golf course driving range will be revegetated with a native hydroseed mix and some container stock, as noted in Figure 4.6-9. The hydroseed and container stock application to the fill slope is proposed to reduce erosion and to revegetate

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the slope in-kind to the native habitat found along the existing creek corridor. The landscape plan shall be approved by the County and shall be monitored for two years to ensure establishment. Established vegetation covering the fill slope is proposed to have a 70 percent coverage, as compared to the native background plants.”

6. The DeLano letter states that “the FEIR’s discussion of mitigation is vague. It is difficult to tell which mitigation parcels will be used and, of these, which portions of those parcels will be used.”

Response: The Draft EIR established criteria for mitigation parcels which could have been met by any of three listed parcels. This is adequate to comply with the requirements of CEQA. However, since publication of the DEIR, it has been determined that the off-site mitigation for the proposed project will occur on the southern portion of the Alamere parcel, as well as a small additional portion on the western side of the Onyx Ridge parcel. These are discussed specifically in the FEIR and the Errata Sheet.

7. The DeLano letter asserts that “[a] prior EIR determined that open space was important to reduce visual impacts. The FEIR claims that this same open space can be vacated, yet there is no discussion as to whether and how conditions have changed since the adoption of the prior EIR. If the open space was important previously, it should be important today unless factors have changed significantly.”

Response: The original mitigation measure set forth the circumstances under which the easement could be vacated, which included preservation of an alternative native landscape. This is all discussed in detail in Attachment 6 to the FEIR, as well as in Response to Hearing Letter Comments BRUN-7. In addition, the Final EIR concludes that vacation of the open space easement is consistent with CEQA.

8. The DeLano letter argues that: “The proposed findings for the vacation of open space are inconsistent with Policy I-103. ... the purpose behind the original dedication of open space was to have an area free of development that was within the viewshed of surrounding properties. The development of Unit 6, even if it with “compatible” residences, takes away the open space purpose served by the easement.”

Response: The vacation was contemplated by the Board of Supervisors at the time it was imposed. As discussed in great detail in Attachment 6 to the FEIR and in Response to Hearing Letter Comments BRUN-7, the proposed vacation is consistent with that contemplation of the Board and the proposed vacation is consistent with the requirements of Policy I-103 and CEQA.

9. The DeLano letter questions the County’s conclusions as to the biological value of Unit 6: “Additionally, the proposed findings for the vacation of the open space easement suggest that

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the biological value in Unit 6 has declined since it was originally set aside, but there is inadequate evidence to show how or why it has declined. If the alleged declined value of the biological open space is associated with the applicant's management of this open space, the applicant should not be rewarded for such a decline, which is likely inconsistent with its obligations under current requirements."

Response: The biological value of Unit 6 has declined because it is surrounded by development and isolated from other biological open space. Further, it is no longer as significant because a plant then occurring on site has now been determined to be less rare than thought at the time of the original approval in 1985. The decline in biological value of Unit 6 is not due to the applicant's management of the open space. This is all discussed in Attachment 6 to the FEIR, and also in Response to Hearing Letter Comments BRUN-7.

10. The DeLano letter states: "There is no biological report or other data showing the quality or quantity of sensitive biological species on the Alamere site or how the sight [sic] provides the "same balance.""

Response: An updated biological report has been submitted to the County from Helix dated December 12, 2007 showing the quality and location of sensitive biological species on the Alamere site. A comparison of the habitat, flora and fauna on the Alamere site to Unit 6 demonstrates that Alamere has higher conservation values. The portion of the Alamere site proposed as mitigation contains 45.87 acres. The North County Multiple Species Program (NCMSCP) has mapped the entire 45.87 acres as Diegan coastal sage scrub, a particularly valuable habitat. The Center for Natural Lands Management (CNLM), the manager of the property, has mapped 44.26 acres as high-quality Diegan coastal sage scrub, with the remaining 1.71 acres mapped as chaparral. The Alamere site supports three pair of coastal California gnatcatchers, with two of the pairs documented as using the southern half of the site. Alamere also supports the following sensitive species: California adolphia; Bell's sage sparrow, California horned lark and the San Diego black-tailed jackrabbit. In contrast, Unit 6 contains 8.27 acres of moderate-quality Diegan coastal sage scrub. The provision of higher-quality habitat as mitigation for vacation of the open space easement over Unit 6 is consistent with both CEQA and Policy I-103.

Further, the County has received a letter from the Center for Natural Lands Management dated January 9, 2008 which attests to the good condition of the site and to the habitat qualities and the various supported species. In addition, the County has received an Email from Susan Wynn at the US Fish & Wildlife Service dated January 10, 2008 which reports that the USFWS has toured the site and approves it as mitigation for the Bridges Unit 6 and the Driving Range. The County has also received an Email from David Mayer at the California Department of Fish & Game dated January 10, 2008 stating that CDFG is willing to trust the judgment of the

January 16, 2008

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USFWS and concurs with the USFWS response regarding the site as set forth in Wynn Email of the same date.

11. The DeLano letter objects that the Final EIR has insufficient discussion of the impacts of the proposed vacation, and “it illegally defers appropriate mitigation for impacts to Unit 6.”

Response: The impact of the proposed vacation is fully discussed, and the Final EIR concludes that it is consistent with CEQA. The Final EIR requires dedication of a perpetual easement over 33.08 acres of high-quality habitat at Alamere prior to or concurrent with vacation of the existing open space easement over 8.02 acres at Unit 6. The mitigation will occur prior to any environmental impacts to Unit 6. Therefore, there is no illegal deferral of mitigation for impacts to Unit 6.

12. The DeLano letter asserts that “[t]he Project is likely to have growth inducing effects, which are insufficiently addressed in the FEIR. Among other things, a 15-foot wide sewer easement has recently surfaced and is proposed for an area leading north of Unit 6.”

Response: Alternative C consists of 5 estate homesites, consistent with the approved Specific Plan for the area. The project will not result in any excess capacity or infrastructure to support additional future development. The 15-foot wide sewer easement was erroneously left on the tract map after withdrawal of the Unit 7 application. It was, in essence, a typographical error, and it has been removed from the Tentative Map and other documents.

13. The DeLano letter states: “Similarly, the designation of a ‘recreational open space’ area leading out of Unit 6 and toward Unit 7 indicates that the applicant intends to develop Unit 7 in the future and plans to seek to vacate that open space in order to construct a road into Unit 7.”

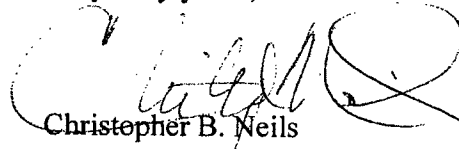
Response: The left over portion of the Unit 6 area was always to be rededicated as recreational open space, as such to be designated the same as the recreational open space for the golf course which adjoin it. As set forth in the Preface to the Final EIR and Chapter 4.0, the application for Unit 7 has been withdrawn, and with that withdrawal the road which had been shown as connecting into Unit 7 was also withdrawn. The land which would have been part of that connecting road is now being added to the rest of the unused portion of Unit 6 which is not covered by the 6 lots, and becomes part of the recreational open space. Nothing in the proposal to dedicate a recreational open space easement over a portion of Unit 6 indicates plans for future vacation of the open space.

14. The DeLano letter states that the project has been revised significantly and the Final EIR should be recirculated with careful attention to the revised Project and its potential impacts.”

January 16, 2008
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Response: As acknowledged in the DeLano letter, recirculation is only required where new significant information is added to the EIR in a way that deprive the public of a meaningful opportunity to comment. Alternative C is a subset of the project discussed in the Draft EIR and no new information was added that would trigger a requirement to recirculate the DIR under CEQA.

Very truly yours,



Christopher B. Neils

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
attorneys for Lennar Communities, as Managing Member of
HCC Investors, LLC

W02-WEST:DM1\400675108.1

cc: Ms. Maggie Loy
Dr. Glenn Russell
Mr. Peter Fagrell
Ms. Patricia Wagner

-----Original Message-----

From: Susan_Wynn@fws.gov [mailto:Susan_Wynn@fws.gov]

Sent: Thursday, January 10, 2008 3:05 PM

To: Loy, Maggie A

Cc: Anzures, Claudia F; David Mayer; Michelle_Moreno@fws.gov;

Therese_ORourke@fws.gov; BarryJ@helixepi.com; mccollum@mccollum.com;

Rosenthal, Deborah M.

Subject: Re: HLP for THE BRIDGES

Maggie - Service staff (Pat Gower) met CNLM at Alamere and toured the property. Although there are several trails on the site, it is very apparent that CNLM is actively managing the site and the site is recovering from previous disturbance - we observed fencing, locked gates, and erosion control measures. Pat also heard at least one gnatcatcher. In addition, Lenar has provided us with maps and a table depicting the acreage they are using for Bridges as well as the 50.13 acres need by the City of Calisbad. Based on our site visit and the information from Lenar, we approve the proposed mitigation on Alamere for the Bridges unit 6 and driving range project.

Susan Wynn

From: David Mayer [mailto:DMayer@dfg.ca.gov]
Sent: Thursday, January 10, 2008 7:05 PM
To: Susan_Wynn@fws.gov; Loy, Maggie A
Cc: Deborah M. Rosenthal; Michelle_Moreno@fws.gov; Therese_ORourke@fws.gov;
BarryJ@helixepi.com; mccollum@mccollum.com; Anzures, Claudia F
Subject: Re: HLP for THE BRIDGES

Maggie,

I will not be able to visit the Alamere site in a reasonable timeframe, but I am willing to trust the Service's judgement and concur with their response on this matter.

Dave

David Mayer
California Department of Fish and Game
4949 Viewridge Avenue
San Diego, California 92123
858-467-4234
858-467-4299 (fax)
dmayer@dfg.ca.gov

>>> <Susan_Wynn@fws.gov> 1/10/2008 3:05 PM >>>
Maggie - Service staff (Pat Gower) met CNLM at Alamere and toured the property. Although there are several trails on the site, it is very apparent that CNLM is actively managing the site and the site is recovering from previous disturbance - we observed fencing, locked gates, and erosion control measures. Pat also heard at least one gnatcatcher. In addition, Lenar has provided us with maps and a table depicting the acreage they are using for Bridges as well as the 50.13 acres need by the City of Calsbad. Based on our site visit and the information from Lenar, we approve the proposed mitigation on Alamere for the Bridges unit 6 and driving range project.
Susan Wynn

Center for Natural Lands Management

A non-profit organization for the protection and management of natural resources

215 West Ash Street
Fallbrook, CA 92028-2904
Phone: 760.731.7790
Fax: 760.731.7791
www.cnlm.org



January 9, 2008

Dr. Glenn Russell
County of San Diego Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

Subject: Alamere Parcel Biological Summary and Land Management Practices

Dear Dr. Russell:

The Center for Natural Lands Management (Center) is the current owner and manager of the 114-acre Alamere parcel (APN No. 223-072-02), and has continuously managed the property to protect biological resource values since 2003. The Center has been managing lands across California since 1990, and currently manages over 50,000 acres in the state. This letter responds to comments raised by various members of the public regarding the habitat quality and habitat management practices on the Alamere parcel. As documented by this letter, the Center believes that the parcel has high habitat value, and is being appropriately managed.

As noted, the Center has been managing the Alamere parcel as part of its larger management efforts in San Diego since 2003. The Alamere parcel is located in the northwestern portion of the large swath of undeveloped lands between Rancho Cielo and Carlsbad, and is considered a key parcel in the overall habitat reserve in northwestern San Diego County. The parcel is located in the center of the core area identified by the U.S. Fish and Wildlife Service (USFWS) as part of the Multiple Habitat Conservation Planning process.

Two habitat types, Diegan coastal sage scrub and southern mixed chaparral occur on the site. The Diegan coastal sage scrub supports an open mosaic of sage scrub species typical of the region including California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), California buckwheat (*Eriogonum fasciculatum*), California adolphia (*Adolphia californica*), and bunchgrass (*Nasella* sp.), among others. The southern mixed chaparral supports chamise (*Adenostoma fasciculatum*), chaparral mallow (*Malacothamnus fasciculatus*), black sage, California sage brush, California buckwheat, among others.

The Center has conducted periodic USFWS protocol coastal California gnatcatcher (*Poliopitula californica californica*) surveys for the entire Alamere parcel, as well as habitat mapping, rare plant inventories, and wildlife movement studies. As many as three coastal California gnatcatcher pairs have been recently documented on the site. Other

Letter to Dr. Glenn Russell
January 9, 2008

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sensitive animal species that have been recently observed at the site include the San Diego horned lizard (*Phrynosoma coronatum blainvilliei*), Bell's sage sparrow (*Amphispiza belli belli*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), California horned lark (*Eremophila alpestris actia*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). A large population of California adolphia also occurs on site. The Center has also conducted wildlife movement studies in the region using remote-census cameras and has verified active movement in the region of bobcat (*Lynx rufus*) and mule deer (*Odocoileus hemionus*), among other large mammals.

When the Center took over management of the Alamere parcel in 2003, off-road vehicle (ORV) use of the site was extremely common. Many vehicles traversed the southern portion of the Alamere to get to the top of the hill, resulting in large swaths of damaged property. Motorcycles and mountain bikers also used the property very often, leaving numerous paths and disturbed patches of vegetation, prior to when CNLM commenced management.

Stopping ORV activity was identified as a top priority management issue to be addressed. The Center took steps to eliminate unauthorized ORV activity by installing fencing and gates at key access points and by conducting weekly patrols of the property. In addition, the Center has implemented long-term restoration efforts of these degraded areas (just over one acre in size), and is implementing a trails management plan that directs foot traffic to specific trails in the area. We have installed many trail signs and at least ten visitor kiosks to educate users about the land and to keep them on-trail. These measures have reduced the area of disturbed lands remaining on the site and have resulted in a controlled use of the property.

The Center strongly disagrees with any assertion that the site is "overrun" with trails, or that the habitat on site is degraded and of low quality. All "trails" on the property at this time existed prior to our ownership, and our management and restoration activities have already reduced at least one mile of trail and degraded land which resulted from activities that occurred prior to our ownership. All of the access points for ORVs have been eliminated, previously disturbed areas are being restored, and the existing habitat on site is of high quality as evidenced by the number of sensitive resources that occur on site. Remaining trails on site are being managed to allow the public controlled access of this significant resource for hiking, bird watching, and other appropriate passive recreation activities.

Please feel free to contact me directly regarding the on going management efforts on the Alamere site.

Letter to Dr. Glenn Russell
January 9, 2008

Page 3 of 3

Sincerely,



Markus Spiegelberg
San Diego Area Manager
Center for Natural Lands Management
4367 Coronado Avenue
San Diego, CA 92107
(619) 295-4953

cc: Maggie Loy, County of San Diego DPLU
Barry Jones, Helix Environmental Inc.

Loy, Maggie A

From: Durham, Mark SPL [Mark.Durham@usace.army.mil]
Sent: Thursday, December 20, 2007 4:04 PM
To: Dan Silver; Michelle Moreno; Therese O'Rourke; Susan Wynn
Cc: Loy, Maggie A
Subject: RE: Request to Re-initiate Consultation on the Bridges Units 6 and 7 Project (2007-413-JMB)

Dan, thanks for the heads-up. Based on the information we have we are not aware of any such situation. If you can provide us with additional information to substantiate these claims we will be happy to look into the matter. In the mean time we are issuing a denial without prejudice Nationwide Permit authorization due to the lack of a 401 certification. We will include a special condition in our permit authorization that a Corps Notice To Proceed must be issued prior to initiation of any work. Mark Durham

From: Dan Silver [mailto:dsilverla@earthlink.net]
Sent: Wednesday, December 19, 2007 5:54 PM
To: Durham, Mark SPL; Michelle Moreno; Therese O'Rourke; Susan Wynn
Cc: Maggie Loy
Subject: Request to Re-initiate Consultation on the Bridges Units 6 and 7 Project (2007-413-JMB)

Dec. 19, 2007

Mark Durham
US Army Corps of Engineers
16885 W Bernardo Dr., Suite 300A
San Diego, CA 92127

RE: Request to Re-initiate Consultation on the Bridges Units 6 and 7 Project (2007-413-JMB)

Dear Mark:

The Endangered Habitats League (EHL) is in receipt of a letter from the USFWS to the USACE on this subject dated Nov. 13, 2007. Compensatory mitigation for loss of coastal sage scrub habitat due to driving range expansion would occur on the Alemir site, which is said to contain habitat of "higher quality" than that which would be lost. However, this appears to be unsubstantiated in that there are no biological surveys of the site. Furthermore, information has been presented to the County of San Diego to the effect that the coastal sage habitat on the Alemir site has been degraded by unauthorized use, including off highway vehicles. According to a neighbor, Camille Perkins (letter of Dec. 12, 2007), "The entire property is now webbed with a massive system of unregulated trails . . ."

While EHL does not question the value of the property toward assembling the MSCP-North gnatcatcher core area, we are nevertheless concerned that the actual amount and quality of coastal sage scrub acres on Alemir may be less than than assumed in the consultation. At a minimum, the status of the site and the potential need for restoration – and management to prevent future degradation – should be assessed by the responsible local, state, and federal agencies as part of the permitting process. If, on the contrary, there is other information documenting the habitat quality on site, its provision would be appreciated.

Sincerely,

Dan Silver
Executive Director
Endangered Habitats League
8424-A Santa Monica Blvd., #592
Los Angeles, CA 90069-4267

Tel 213-804-2750

1/8/2008

Loy, Maggie A

From: Dan Silver [dsilverla@earthlink.net]
Sent: Sunday, December 16, 2007 2:06 PM
To: Loy, Maggie A; Therese O'Rourke; Susan Wynn; David Mayer
Subject: Draft Habitat Loss Permit (HLP) for THE BRIDGES AT RANCHO SANTA FE PROJECT, LOG NO. 01-08-040

Dec. 15, 2007

Maggie Loy
Dept. Planning and Land Use
5201 Ruffin Rd, Suite B
San Diego, CA 92123

RE: Draft Habitat Loss Permit (HLP) for THE BRIDGES AT RANCHO SANTA FE PROJECT, LOG NO. 01-08-040 — Additional Comments

Dear Ms. Loy:

Information has been presented to the County of San Diego to the effect that the coastal sage habitat on the Alamere site has been degraded by unauthorized use, including off highway vehicles. According to a neighbor, Camille Perkins (letter of Dec. 12, 2007), "The entire property is now webbed with a massive system of unregulated trails . . ." While EHL does not question the value of the property toward assembling the MSCP-N gnatcatcher core area, we are nevertheless concerned that the actual amount and quality of coastal sage scrub acres on Alamere may be less than than assumed in the HLP. Because there has been no recent biological survey of the property, the findings contained in the HLP appear unsubstantiated. At a minimum, the status of the site and the potential need for restoration – and management to prevent future degradation – should be assessed by the responsible local, state, and federal agencies as part of this permitting process. If, on the contrary, there is other information substantiating the habitat quality on site, its provision would be appreciated.

Sincerely,

Dan Silver
Executive Director
Endangered Habitats League
8424-A Santa Monica Blvd., #592
Los Angeles, CA 90069-4267

Tel 213-804-2750
Fax 323-654-1931
dsilverla@earthlink.net
www.ehleague.org

cc: USFWS, CDFG

Loy, Maggie A

From: McKee, John
Sent: Tuesday, January 08, 2008 8:01 AM
To: Loy, Maggie A
Cc: Kirkland, Timothy R
Subject: Lennar Bridges LLC, Santa Fe Creek
Attachments: 0319_001.pdf

Hello Maggie, attached are two Admin Warnings I sent to Lennar Bridges LLC on 01/07/08. I cited them for SDCZO 7705, violation of the "Specific Plan" and SDCCRO 51.0106.1, Building permits required for the over-height fence surrounding the two tennis courts, the office trailer/pro shop and the electrical/plumbing. On 12/28/07 I met with Ken Ayers (ph# 858 759 3600) at the site and discussed the issues with him. I found Mr Ayers to be very cooperative and he advised me that he was unaware the tennis courts were in violation of the "Specific Plan". Mr Ayers further told me that he would work with the county to correct the violations. If you have any further questions please call or email myself or Tim Kirkland. I hope this helps. Thank you John McKee



Citation No. DPLU- 30050

**DEPARTMENT OF PLANNING & LAND USE
ADMINISTRATIVE CITATION**

Issuance Date: <u>JANUARY 7, 2008</u>		Case Number: <u>07-0035 250</u>	
<input checked="" type="checkbox"/> WARNING <input type="checkbox"/> 1 st Citation \$100 <input type="checkbox"/> 2 nd Citation \$200 <input type="checkbox"/> 3 rd Citation \$500 <input type="checkbox"/> 4 th and Subsequent Citations \$1000			
Payments of \$ <u>0</u> is due no later than <u>—</u> (See reverse side for payment instructions)			
Correction of the violations indicated below must be completed by: Date: <u>2-7-08</u> Time: <u>12:00 P.M.</u> The Building Official will suspend or refuse to issue any building permits until all violations are corrected per Section 51.0103.4 of the County Regulatory Code. If you fail to correct the violations by this date, the next level citation may be issued.			
Person Cited: Last First Middle		<input checked="" type="checkbox"/> Property Owner <input type="checkbox"/> Tenant <input checked="" type="checkbox"/> Business Owner <input type="checkbox"/> Other	
<u>LENNAR BRIDGES LLC</u>			
Mailing Address: City State Zip Code		Business Name (If Applicable)	
<u>CT CORPORATION SYSTEM</u> <u>25 ENTERPRISE ALISO VIEJO CA. 92656</u>		<u>SANTA FE CREEK</u>	
Violation Address: City		Phone #:	Assessor's Parcel Number:
<u>4543 CALLE MESSINA RANCHO SANTA FE</u>		<u>—</u>	<u>264-65-00700</u>
Code Section Violated	Date of Violation	Description of Violation	
<u>SDCCO 51.0103</u>	<u>12-28-07</u>	<u>VIOLATIONS, PENALTIES AND RESPONSIBILITIES FOR COMPLIANCE W/ COUNTY BUILDING REGULATIONS TO WIT: SDCCO 51.0106.1 BUILDING PERMITS REQUIRED FOR OVER HEIGHT FENCE SURROUNDING TENNIS COURTS, OFFICE TRAILER AND ALL ELECTRICAL AND PLUMBING.</u>	
Corrections Required: <u>SEE ENCLOSED DPLU FORM 68</u>			
<u>① OBTAIN REQUIRED PERMITS FOR OVER-HEIGHT FENCE SURROUNDING TENNIS COURT OR LOWER TO 72". ② OBTAIN PERMITS FOR OFFICE TRAILER, ALL PLUMBING & ELECTRICAL OR ③ REMOVE ALL</u>			
ENFORCING OFFICER: CALL FOR AN APPOINTMENT		Phone: <u>760 940 2984</u>	
Name (Print): <u>JOHN MURPHY</u>		Signature: <u>[Signature]</u>	Date: <u>1-7-08</u>
PERSON CITED:			
Name (Print): <u>LENNAR BRIDGES LLC</u>		Signature: <u>—</u>	Date: <u>—</u>
Citation Served: <input type="checkbox"/> In Person (To:) <input type="checkbox"/> Posted on Property <input checked="" type="checkbox"/> By Mail			
By: <u>[Signature]</u> <input type="checkbox"/> Other: <u>—</u>			

DPLU #621 (4/07)

READ REVERSE SIDE

Original: CE File Copy Green: Person Cited Yellow: Fiscal 1 Pink: Fiscal 2 Gold: Remittance Copy



Citation No. DPLU-30051

**DEPARTMENT OF PLANNING & LAND USE
ADMINISTRATIVE CITATION**

Issuance Date: JANUARY 7, 2008 Case Number: 07-0035850
☒ **WARNING** ☐ **1st Citation** ☐ **2nd Citation** ☐ **3rd Citation** ☐ **4th and Subsequent Citations**
\$100 \$200 \$500 \$1000

Payments of \$ 0 is due no later than — (See reverse side for payment instructions)

Correction of the violations indicated below must be completed by: Date: 2-7-08 Time: 12:00 P.M.
The Building Official will suspend or refuse to issue any building permits until all violations are corrected per Section 51.0103.4 of the County Regulatory Code. If you fail to correct the violations by this date, the next level citation may be issued.

Person Cited: Last First Middle
LENNAR BRIDGES LLC
☒ Property Owner ☐ Tenant
☒ Business Owner ☐ Other

Mailing Address: City State Zip Code
CT CORPORATION SYSTEM
25 ENTERPRISE ALISO VIEJO CA. 92656
Business Name (If Applicable)
SANTA FE CREEK

Violation Address: City Phone #: Assessor's Parcel Number:
4543 CALLE MESSINA RANCHO SANTA FE — 264-65-007-00

Code Section Violated	Date of Violation	Description of Violation
<u>S.D.C.2.O. 7703</u>	<u>12.28.07</u>	<u>VIOLATIONS AND PENALTIES, UNLAWFUL USE OF THE LANDS, TO WIT: SDC20 7705, SPECIFIC PLAN NO. 92-01, SPA03-006 DOES NOT INCLUDE TENNIS COURTS OR OFFICE TRAILER/PRO SHOP.</u>

Corrections Required: (1) OBTAIN MODIFICATION OR WAIVER ON SITE PLAN FOR TENNIS COURTS AND OFFICE TRAILER OR
(2) REMOVE ALL

ENFORCING OFFICER: CALL FOR AN APPOINTMENT Phone: 760 940 2984
Name (Print): JOHN MULLER Signature: [Signature] Date: —

PERSON CITED:
Name (Print): Signature: Date:

Citation Served: ☐ In Person (To:) ☐ Posted on Property ☐ By Mail
By: ☐ Other:



The Bridges
RECEIVED
DEC 14 2007

August 7, 2007

San Diego County
Planning Commission

Dear ,

Thank you for attending our "Just One" Summer Concert at The Bridges Club on Saturday evening, July 28th. We hope you enjoyed the fine food prepared by our Executive Chef, Andy Johnson and had a chance to dance to the sounds of The Wayne Foster Band. Hopefully, that evening has piqued your interest in our Club.

The Bridges Club's extensive array of world-class amenities and facilities, include:

- Championship Robert Trent Jones, II-designed golf course, with a no-tee-time policy for your golfing convenience.
- An award-winning 36,000 square foot clubhouse.
- 10,000 square foot Sports Centre featuring a fitness center, family recreation facility and day-spa.
- Pool Center with Poolside Cafe.
- Two Tennis courts and outdoor events lawn. (Construction has just begun on a new Tennis Complex and Children's Sports Court.)

Even more impressive than our facilities is our membership base. If you have an interest in exploring membership in San Diego's finest and most exclusive Club, please contact me or Joni Stuart, (jstuart@thebridgesrsf.com) Membership Director at 858-756-8700.

Sincerely,

Gordon Cooke

Director of Membership Development

The Bridges at Rancho Santa Fe

858-756-8700

gcooke@thebridgesrsf.com

THE BRIDGES AT RANCHO SANTA FE, 6670 AVENIDA DEL DUQUE, P.O. BOX 1322, RANCHO SANTA FE, CA 92067
VOICE 858.756.8700 • FAX 858.756.8777 • EMAIL bridgesinfo@thebridgesrsf.com • www.thebridgesrsf.com

MEMBER SERVICES:

- **Our Turf Club** guest passes at the Del Mar Racetrack have been a very popular amenity this year! The season ends on September 5th. Since they are good for any day, be pro-active and pick some up in advance! This way you can be prepared for those impromptu visits to the track. Each guest pass is \$35, billed to your member account at the time of purchase from the Concierge.
- **The Padre Season** is still here. Please call the Concierge to reserve your tickets.
- **Charger Season is upon us!** Tickets are on the 50-yard line, Sheltered Club Level Seating. Most dates are available for the regular season. There are four tickets per game at \$290.00 per ticket, minimum sale is two tickets. Here are some of the amenities you can expect:
 - Four beautiful Club-level lounges for your pre-game, half-time and post-game enjoyment.
 - Wider, padded seats with attached cup holder.
 - Wait service provided from the comfort of your seat.
 - Relax and dine in style and comfort in the Stadium Club.
 - A variety of food specialties you may purchase.
 - Exclusive promotions and special appearances.
 - Parking is included.

Call the Concierge to reserve your tickets. 858-759-7200

- **We are getting ready to put together the 2008 Member Directory.** If you have any changes and have not sent in your change form, please contact the Concierge or Fax us at: 858-759-7215.
- **Please keep in mind** that we welcome, and encourage, member suggestions for all sorts of activities and amenities. We receive requests for various referrals: restaurants, salons, doctors, veterinarians, dentists, just to name a few. Remember, we value your opinions more than anyone else in town, so please share your experiences with us!

TENNIS:

- **It's a very exciting time** here at The Bridges with our tennis program. We should have an extra two courts up and running by fall which means we can host Winter Leagues (which normally require three courts) and USTA Leagues in the spring. Please be sure to get a USTA number and an NTRP rating by the end of the year so that we can place you in USTA teams where the ratings are different.

The Fall League sign ups are complete and we have three teams representing The Bridges - CC, BB and A. Summer Kids' Tennis Camps are going strong and we have two more weeks to go so sign up your children! We currently have 20 juniors on our tennis challenge ladder so encourage your kids to come down and compete. Our full Fall Tennis Program will be displayed on the online tennis calendar.

If you need to get involved in any tennis programs, private lessons or group lessons, call Crombie Hatfield, Tennis Director, at 858-759-6071.

<http://members.thebridgesrsf.com>



THE BRIDGES CLUB
18550 SEVEN BRIDGES ROAD
PO BOX 1322
RANCHO SANTA FE CA 92067-1322

VOICE 858.759.7200
FAX 858.759.7201

March 16, 2007

Dear Bridges' Club Member,

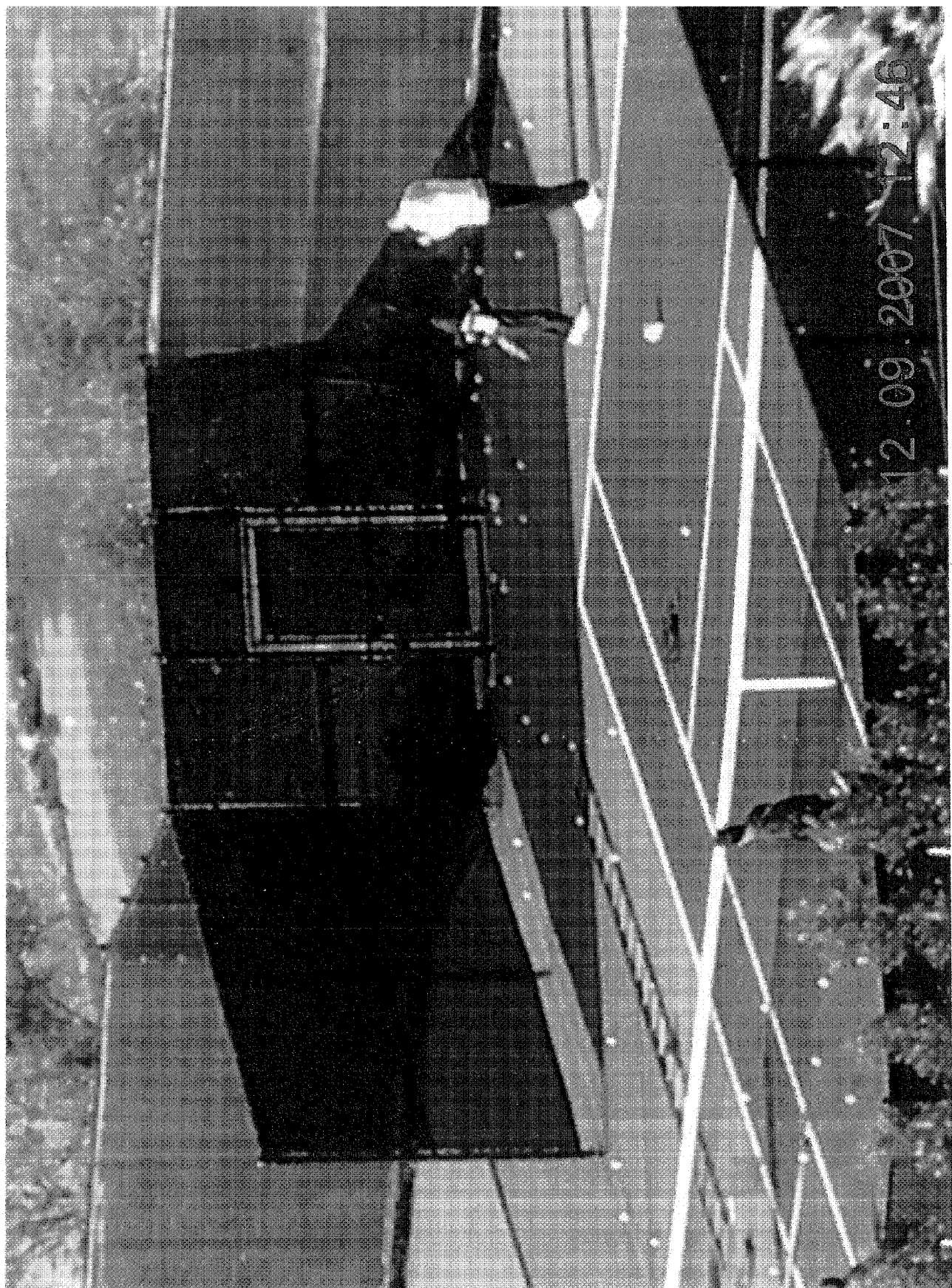
The "State of The Club" Meeting held on Sunday, March 11th proved to be very informative and well received with over 200 members in attendance. The three most important topics addressed were: enhanced golf practice facility and tennis/family recreation area; membership growth/resignation list; financial viability of the Club at turnover. We have expanded our original plans for the tennis center to include more courts (five courts including an exhibition center court) – a sport court, pro shop, playground, and more. We hope all this information was helpful so you could better understand where we currently are and where we are going. The topics that were discussed were taken from your responses to our recent member survey. We feel this meeting was very important to in order to provide a better picture of the Club's future and we thank those who attended.

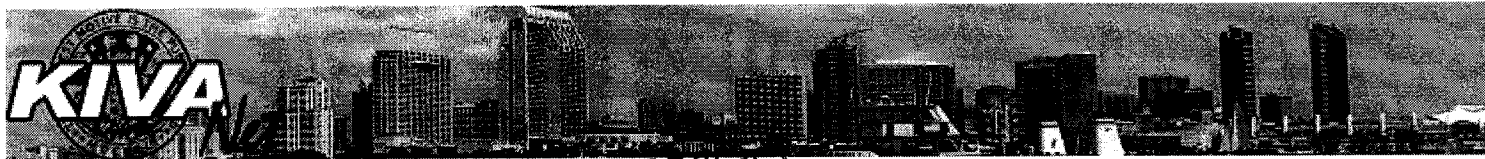
We would also like to thank everyone who responded to the recent member survey. Many comments were made relating to your Food & Beverage and Sports Centre experiences and we will be making some positive changes based on your comments. As always, we appreciate your feedback and encourage you to let us know how we are doing. For those interested, results from the survey can be found on our web site.

CLUB EVENTS:

- **Member Appreciation Night** – Join us on Saturday, March 24th for our annual celebration honoring YOU, our members! The evening starts at 5:00 p.m. in the Clubhouse where we will be serving complimentary hors d'oeuvres and hosted beverages. There will be live music, dancing, special activities for the children (at the Sports Centre) and more. Reservations are required. *Please note: there will be no regular dinner service available in order to accommodate this special member event.*
- **Family Easter Carnival** – Bring your whole family for a fun-filled day on Saturday, April 7th. Each year the Easter Bunny's arrival is a big surprise – something different and exciting! The day starts at 11:00 a.m. with all sorts of crafts, games, bounce houses, petting zooand more! A barbecue lunch buffet will start at 11:30 a.m. followed by the Easter Egg Hunt at 1:00 p.m. Reservations are required. Please phone the Concierge (858-759-7200). Adults \$38, Children (6-12) \$17. *Note: Casual attire recommended.*
- **Easter Brunch** – Celebrate Easter at The Bridges and leave the cooking to us. Easter Brunch will be served from 10:30-2:30 p.m. on Sunday, April 8th. The menu will be very diverse with everything from traditional ham to eggs benedict to fabulous desserts. Reservations are required and may be made by calling the Concierge (858-759-7200). Adults \$48, Children 6-12 \$17. *There will be no regular breakfast or lunch service this day; however, continental breakfast and lunch will be offered at the Snack Bar and Poolside Cafe.*
- **Cinco de Mayo Fiesta** – Saturday, May 5th will be our annual celebration of Cinco de Mayo! Join us from 5:30-7:30 for south-of-the-border cuisine and a variety of margaritas to help get in the spirit! Look for treats on the golf course as well throughout the day.

<http://members.thebridgesrsf.com>




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 San Diego County
 Planning Commission
Permit Summary*The Bridges*[\[CHANGE PROJECT\]](#)

Permit:	1007 20060848	Flags:	NO
Description:	ELECTRICAL		
Project:			
Status:	OPEN	Entered:	07-Nov-2006
Issued:	07-Nov-2006	Completed:	
Decision:			
Expiration:	05-Nov-2009	Next Renewal:	07-Nov-2006
Location Desc.:			

Permit Manager

Permit Name:			
Lead Person:			
Default Inspector:			
Status:	OPEN-PERMIT TYPE CHANGED		
Issued Date:	07-Nov-2006	Expiration Date:	05-Nov-2009
Desc. Status:			
Renew Eff. Date:		CEQA Status:	
Difficulty:		Renewable:	

Parcel Information

Address	APN	
4508 CALLE MESSINA	264-650-01-00	GIS Parcel

Scope of Work

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